

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

UNITED STATES OF AMERICA; the )  
States of California, Colorado, )  
Connecticut, Delaware, Florida, Georgia, )  
Hawaii, Illinois, Indiana, Iowa, )  
Louisiana, Maryland, the )  
Commonwealth of Massachusetts, )  
Michigan, Minnesota, Montana, Nevada, )  
New Hampshire, New Jersey, New ) Civil Action No.: 2:14-CV-02077-PMD  
Mexico, New York, North Carolina, )  
Oklahoma, Rhode Island, Tennessee, )  
Texas, the Commonwealth of Virginia, )  
Washington, Wisconsin, and the District )  
of Columbia, )  
Ex rel. DR, GIBRAN AMEER, )  
Plaintiffs, )  
vs. )  
RESPIRONICS, INC., )  
Defendant. )

---

**JOINT STIPULATION OF DISMISSAL OF ALL CLAIMS**  
**BROUGHT ON BEHALF OF THE UNITED STATES**

Pursuant to Rule 41(a)(1) of the Federal Rules of Procedure and the qui tam provisions of the False Claims Act 31 U.S.C. § 3730(b)(1), and in accordance with the terms of this settlement agreement between the United States, Relator and Defendant, the United States on behalf of the United States and the Relator stipulate to the entry of an order: (1) dismissing all claims brought on behalf of the United States with prejudice as to the United States for the claims within the Covered Conduct released in the Settlement Agreement, and without prejudice as to any other

claims; (2) dismissing with prejudice as to the Relator for all claims brought on behalf of the United States; (3) dismissing with prejudice as to the Relator for all claims brought on behalf of himself.

The Relator, on behalf of himself, his heirs, successors, attorneys, agents, and assigns, stipulate that the Settlement Amount set forth in the Settlement Agreement with the United States and the terms and conditions described therein are fair, adequate and reasonable under all the circumstances, that he will not challenge the settlement pursuant to 31 U.S.C. §3730(c)(2)(B), and that he expressly waives the opportunity for a hearing on any objection to the Settlement Agreement pursuant to 31 U.S.C. § 3730(c)(2)(B).

The United States and Relator respectfully request that the Court enter an order in the form of the attached proposed order dismissing all claims brought on behalf of the United States.

This Stipulation does not seek the dismissal of the claims brought by the Relator on behalf of the States or the Relator's share of those claims.

Respectfully submitted,

WILLIAM N. NETTLES  
United States Attorney

By: s/Jennifer J. Aldrich  
Jennifer J. Aldrich (#6035)  
Assistant United States Attorneys  
1441 Main Street, Suite 500  
Columbia, South Carolina 29201  
Telephone (803) 343-3176

By: s/Andrew G. Melling  
Andrew G. Melling, Fed. ID #7882  
Celeste T. Jones, Fed. ID #2225  
A. Victor Rawl, Jr., Fed. ID #6971  
1221 Main Street, P.O. Box I1390  
Columbia, South Carolina 29211  
(803) 799-9800  
Attorneys for Qui Tam Relator

March 23, 2016